

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MATTHEW P. PLOUFFE and
COMMONWEALTH SECOND
AMENDMENT, INC.

Plaintiffs

-against-

CIVIL ACTION NO. 1:13-cv-12322-RGS

ROBERT L. MACDONALD,
in his Official Capacity as
Chief of the Dighton Police Department,
Defendant

JOINT SCHEDULING CONFERENCE STATEMENT

Pursuant to Local Rule 16.1, counsel for the parties have conferred and now submit this Joint Scheduling Conference Statement pursuant to an Order of this Honorable Court entered November 28, 2013.

Proposed Pretrial Schedule

This case was filed on September 20, 2013. A Motion to Dismiss was filed by the Defendants on October 16, 2013. Counsel accordingly propose the following pretrial schedule:

1. AMENDMENT OF PLEADINGS to be completed by June 1, 2014.
2. INITIAL DISCLOSURES required by Fed. R. Civ. P. 26(a)(1) to be completed by January 1, 2014.
3. FACT DISCOVERY, including service of and responses to written discovery requests and all depositions, to be completed by August 1, 2014.
4. EXPERT DISCOVERY
 - a. Plaintiff's trial experts designated and information required by Fed. R. Civ. P. 26(a)(2) disclosed by September 1, 2014.
 - b. Defendants' trial experts designated and information required by Fed. R. Civ. P. 26(a)(2) disclosed by October 1, 2014.
 - c. Expert depositions concluded by November 1, 2014.

5. DISPOSITIVE MOTIONS

a. Dispositive motions filed by October 15, 2014.

b. Oppositions to dispositive motions filed by November 15, 2014.

6. CASE MANAGEMENT AND PRETRIAL CONFERENCES on dates to be determined by the Court.

/s/Matthew J. Costa

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 9, 2013, this document was filed electronically through the Court's CM/ECF system and thereby delivered by electronic means to all counsel of record.

/s/ Matthew P. Trask